

EXHIBIT 1-B

----- Forwarded message -----

From: Thomas D. Siver <tsiver@siverlaw.com>

Date: On Thu, Jun 12, 2025 at 3:12 PM

Subject: Fw: Siver & Associates, PLLC: Re: Siver & Associates, PLLC: Re: Siver & Associates, PLLC: 2:23-cv-11718 on behalf of Bill Bachenberg

To: Firm Burns Law <tblf@pm.me>

Cc: Todd Stuart <tstuart@stuartlawplc.com>, Michael Smith <msmith@mikesmithlaw.com>, Firm Burns Law <tblf@pm.me>

I was informed the wire went successfully around 2:30 3 o'clock my time 130 2 o'clock yours. Please confirm please let me know when the order will be uploaded to the court.

Sent from my iPhone

On Jun 12, 2025, at 12:28 PM, Burns Law Firm <tblf@pm.me> wrote:

Hi Tom:

As soon as I have confirmation of the funds transfer I send you the form.

Do you anticipate the transfer will occur today?

Thank you,
John

On Thu, Jun 12, 2025 at 6:05 AM, Thomas D. Siver <tsiver@siverlaw.com> wrote:

Need the signed document for filing
Sent from my iPhone

On Jun 11, 2025, at 9:29 PM, Burns Law Firm <tblf@pm.me> wrote:

Hi Tom:

For the wire, please send resolution funds to [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Happy to file the dismissal as to your client upon receipt of the funds.

Thanks,
John

On Wed, Jun 11, 2025 at 5:43 PM, Thomas D. Siver <tsiver@siverlaw.com> wrote:

Good Day!

Please find attached the proposed order I would like you to review, and we can file.

Please provide your wire information so I can have the demand funds immediately transferred.

Very truly yours,
Tom Siver
Attorney at Law
(517)712-2331

[REDACTED]

----- Forwarded message -----

From: Burns Law Firm <tblf@pm.me>
Date: On Thu, Jun 12, 2025 at 8:43 PM
Subject: Fw: Re: Siver & Associates, PLLC: Re: Siver & Associates, PLLC: Re: Siver & Associates, PLLC:
2:23-cv-11718 on behalf of Bill Bachenberg
To: Thomas D. Siver <tsiver@siverlaw.com>
Cc: Todd Stuart <tstuart@stuartlawplc.com>, Michael Smith <msmith@mikesmithlaw.com>, Burns Law Firm <tblf@pm.me>

Hi Tom:

As we just discussed on the phone, I checked the trust account. The transfer was initiated but is being held by the bank. I will call them first thing in the morning to see what the deal is. I suspect that they are placing a brief hold on the funds simply because of the size of the transfer.

I'm authorized by my client to file the dismissal as soon as the funds clear.

As I said earlier, I'm sensitive to your client's position. As soon as I get the lay of the land tomorrow w the bank I'll ping you.

Thanks,
John

[Quoted text hidden]

----- Forwarded message -----

From: Burns Law Firm <tblf@pm.me>
Date: On Thu, Jun 12, 2025 at 8:43 PM
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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

Happy to file the dismissal as to your client upon
receipt of the funds.

Thanks,
John

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<tsiver@siverlaw.com> wrote:

Good Day!

Please find attached the
proposed order I would like
you to review, and we can file.

Please provide your wire
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demand funds immediately
transferred.

Very truly yours,
Tom Siver
Attorney at Law
(517)712-2331

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From: Burns Law Firm <tblf@pm.me>
Date: On Thu, Jun 12, 2025 at 11:28 AM
Subject: Fw: Re: Siver & Associates, PLLC: Re: Siver & Associates, PLLC: 2:23-cv-11718 on behalf of Bill Bachenberg
To: Thomas D. Siver <tsiver@siverlaw.com>
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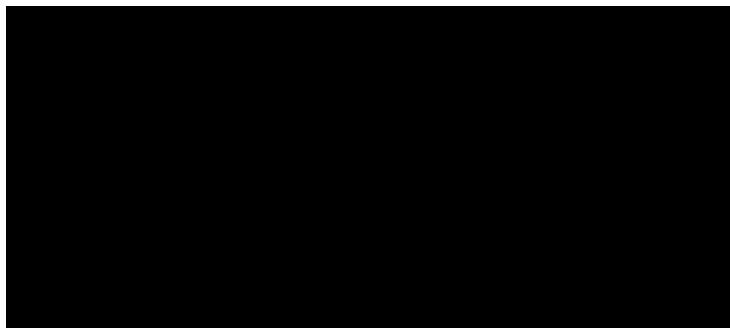
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Tom Siver
Attorney at Law
(517)712-2331

UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN

YACOV APELBAUM, a New York resident,
and XRVISION, LTD., a New York corporation,

Plaintiffs,

HON. ROBERT WHITE
Case No. 23-CV-11718

vs.

BILL BACHENBERG ET AL.,

Defendants.

John C. Burns

Burns Law Firm
PO Box 191250
Saint Louis, MO 63119
314-329-5040
Fax: 314-282-8136
Email: TBLF@pm.me

Todd A. Stuart

Stuart Law, PLC
429 Turner Ave. NW
Grand Rapids, MI 49504
Office: 616-284-1658
Email: tstuart@stuartlawplc.com

Thomas D. Siver

Siver & Associates, PLLC
PO Box 3253
Grand Rapids, MI 49501
616-261-5800
Email: tsiver@siverlaw.com

Michael J. Smith

Michael J Smith Assoc
12900 Hall Road
Suite 300
Sterling Heights, MI 48313
(586) 254-0200
Fax: (586) 254-0201
Email: msmith@mikesmithlaw.com

ORDER OF DISMISSAL WITH PREJUDICE

This Court finds that Defendant Bill Bachenberg has satisfied the \$500,00.00 demand, and this case is now closed and dismissed with prejudice.

Honorable Robert White

June 11, 2025

Approved:

John C. Smith
Plaintiff

Thomas D. Siver
Defendant



----- Forwarded message -----

From: Thomas D. Siver <tsiver@siverlaw.com>
Date: Wed, Jun 11, 2025 at 10:54 PM
Subject: Siver & Associates, PLLC: Re: 2:23-cv-11718 on behalf of Bill Bachenberg
To: TBLF@pm.me <TBLF@pm.me>, Todd Stuart <tstuart@stuartlawplc.com>
Cc: msmith@mikesmithlaw.com <msmith@mikesmithlaw.com>

Good Day!

Attached is the word version. It is my understanding the judge requires the order in word. Please place your digital signature on the proposed attached order. And I will file this matter tomorrow. I look forward to receiving your wire information into your trust account. Thank you for your time and consideration.

Very truly yours,
Tom Siver
(616)261-5800

From: Thomas D. Siver
Sent: Wednesday, June 11, 2025 5:43 PM
To: TBLF@pm.me <TBLF@pm.me>; Todd Stuart <tstuart@stuartlawplc.com>
Cc: msmith@mikesmithlaw.com <msmith@mikesmithlaw.com>
Subject: 2:23-cv-11718 on behalf of Bill Bachenberg

Good Day!

Please find attached the proposed order I would like you to review, and we can file.

Please provide your wire information so I can have the demand funds immediately transferred.

Very truly yours,
Tom Siver
Attorney at Law
(517)712-2331

--

Todd A Stuart
Founder and Managing Member
Stuart Law, PLC
Appointments: [2851 Charlevoix Dr SE #207, Grand Rapids, MI 49546](#)
Mailings: [5557 28th Street SE, STE B 328, Grand Rapids, MI 49512](#)
[\(616\) 202-6541](#)

Stuart Law PLC



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 David - ORDER OF DISMISSAL ver 2.docx
16K

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Date: On Wed, Jun 11, 2025 at 4:43 PM
Subject: Fw: Siver & Associates, PLLC: 2:23-cv-11718 on behalf of Bill Bachenberg
To: TBLF@pm.me <TBLF@pm.me>,Todd Stuart <tstuart@stuartlawplc.com>
Cc: msmith@mikesmithlaw.com <msmith@mikesmithlaw.com>

Good Day!

Please find attached the proposed order I would like you to review, and we can file.

Please provide your wire information so I can have the demand funds immediately transferred.

Very truly yours,
Tom Siver
Attorney at Law
(517)712-2331



[David - ORDER OF DISMISSAL ver 2.pdf](#)

57K

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From: Burns Law Firm <tblf@pm.me>
Date: On Wed, Jun 11, 2025 at 6:51 PM
Subject: Fw: Re: Siver & Associates, PLLC: 2:23-cv-11718 on behalf of Bill Bachenberg
To: Thomas D. Siver <tsiver@siverlaw.com>
Cc: Todd Stuart <tstuart@stuartlawplc.com>,Michael Smith <msmith@mikesmithlaw.com>,Burns Law Firm <tblf@pm.me>
Hi Tom:

My client accepts your client's offer to resolve the dispute.

I will get you my trust account information either later this evening or first thing in the morning, for the funds transfer.

Thank you,
John

On Wed, Jun 11, 2025 at 5:43 PM, Thomas D. Siver <tsiver@siverlaw.com> wrote:

Good Day!

Please find attached the proposed order I would like you to review, and we can file.

Please provide your wire information so I can have the demand funds immediately transferred.

Very truly yours,
Tom Siver
Attorney at Law
(517)712-2331

Bachenberg Dismissal

Todd Stuart <tstuart@stuartlawplc.com>

Fri, Jun 13, 2025 at 1:46 PM

To: Tom Siver <TSiver@siverlaw.com>, Jonathon Burns [REDACTED], Michael Smith <msmith@mikesmithlaw.com>

Tom, Mike and Jonathon,

Here is what we have for the cleaned up draft. Can I confirm everyone is in agreement and we will get this filed ASAP?
Thanks!

Todd

--



Todd A Stuart

Founder and Managing Member

Stuart Law, PLC

Appointments: [2851 Charlevoix Dr SE #207, Grand Rapids, MI 49546](#)

Mailings: [5557 28th Street SE, STE B 328, Grand Rapids, MI 49512](#)
[\(616\) 202-6541](#)

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[2025-06-13_c_Apelbaum v Lambert - Stipulated Dismissal of Bachenburg.pdf](#)
131K

Siver & Associates, PLLC: Re: Bachenberg Dimissal

3 messages

Thomas D. Siver <tsiver@siverlaw.com>
To: Todd Stuart <tstuart@stuartlawplc.com>
Cc: Jonathon Burns [REDACTED], Michael Smith <msmith@mikesmithlaw.com>

Fri, Jun 13, 2025 at 1:55 PM

Good day!

First the 500k needs to reference it is being paid pursuant to the demand. My initial proposed order was sufficient and John agreed to it with only attorney names and addresses being changed.

Second this order is only for bill and he doesn't speak for attorney Lambert and doesn't need to make reference to her case.

Therefore please immediately make the changes and forward for approval. Finally, judge requires this order in word not pdf.

Tom Siver
616-261-5800

Sent from my iPhone

On Jun 13, 2025, at 1:47 PM, Todd Stuart <tstuart@stuartlawplc.com> wrote:

Tom, Mike and Jonathon,
Here is what we have for the cleaned up draft. Can I confirm everyone is in agreement and we will get this filed ASAP? Thanks!

Todd

--



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Todd Stuart <tstuart@stuartlawplc.com>
To: "Thomas D. Siver" <tsiver@siverlaw.com>
Cc: Jonathon Burns [REDACTED], Michael Smith <msmith@mikesmithlaw.com>

Fri, Jun 13, 2025 at 2:12 PM

Updated draft

[Quoted text hidden]

 **2025-06-13 - Apelbaum v Lambert - Stipulated Dismissal of Bachenburg.docx**
21K

Todd Stuart <tstuart@stuartlawplc.com>
To: "Thomas D. Siver" <tsiver@siverlaw.com>
Cc: Jonathon Burns [REDACTED], Michael Smith <msmith@mikesmithlaw.com>

Fri, Jun 13, 2025 at 2:14 PM

Sorry, corrected Mr. Bachenberg's name spelling. Thanks!

Todd

[Quoted text hidden]

 **2025-06-13 - Apelbaum v Lambert - Stipulated Dismissal of Bachenburg.docx**
21K

Siver & Associates, PLLC: RE: Siver & Associates, PLLC: Re: Bachenber Dimissal

1 message

Thomas D. Siver <tsiver@siverlaw.com>

Fri, Jun 13, 2025 at 3:05 PM

To: Todd Stuart <tstuart@stuartlawplc.com>

Cc: Jonathon Burns [REDACTED], Michael Smith <msmith@mikesmithlaw.com>

Once again, please call me; however, attached is the simple order with your caption changes and in a form which we all approved the other day prior to the funds being sent. For convenience I have attached todays as well as the original order the parties agreed too,

Please call me at (616)261-5800

Thanks,

Tom

From: Todd Stuart <tstuart@stuartlawplc.com>

Sent: Friday, June 13, 2025 2:14 PM

To: Thomas D. Siver <tsiver@siverlaw.com>

Cc: Jonathon Burns [REDACTED] Michael Smith <msmith@mikesmithlaw.com>

Subject: Re: Siver & Associates, PLLC: Re: Bachenber Dimissal

Sorry, corrected Mr. Bachenber's name spelling. Thanks!

Todd

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<2025-06-13 _c__Apelbaum v Lambert - Stipulated Dismissal of Bachenburg.pdf>



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 **David - ORDER OF DISMISSAL 20250613TDSv2.docx**
17K

 **ORDER OF DISMISSAL ver 2.docx**
21K

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

YACOV APELBAUM, a New York resident,
and XRVISION, LTD., a New York
corporation,

Case No. 2:23-cv-11718

Plaintiffs,

Hon. Robert J. White

v.

STEPHANIE LAMBERT, a Michigan resident,
and THE LAW OFFICE OF STEPHANIE L
LAMBERT, PLLC, A Michigan professional
limited liability company, and BILL
BACHENBERG, a Pennsylvania resident,

Defendants.

BURNS LAW FIRM

John C. Burns
Attorneys for Plaintiffs
PO Box 191250
St. Louis, Missouri 63119
(314) 329-5040
TBLF@pm.me

STUART LAW PLC

Todd A. Stuart (P70187)
Attorneys for Plaintiff
2851 Charlevoix Dr SE, STE 207
Grand Rapids, MI 49546
Mailing: 5557 28th Street SE
STE B 328, Grand Rapids, MI 49512
(616) 209-9270
tstuart@stuartlawplc.com

**THE LAW FIRM OF MICHAEL J.
SMITH AND ASSOCIATES, PLLC**

Michael J. Smith (P36706)
Jamal R. Harris (P63835)
John H. Mott (P81990)
Attorneys for Defendant Bill Bachenberg
70 Macomb Place, Suite 200
Mt. Clemens, MI 48043
(586) 254-0200
msmith@mikesmithlaw.com
jharris@mikesmithlaw.com
jmott@mikesmithlaw.com

SIVER AND ASSOCIATES, PLC

Thomas D. Siver (P69751)
Attorneys for Defendant Bill Bachenberg
PO Box 3253
Grand Rapids, MI 49501
(616) 261-5800
tsiver@siverlaw.com

ORDER OF DISMISSAL WITH PREJUDICE
AGAINST DEFENDANT BILL BACHENBERG

This Court finds Defendant Bill Bachenberg has satisfied the \$500,00.00 demand, and dismisses this matter with prejudice against Defendant Bill Bachenberg.

This order resolves the last pending claim, and closes this case.

Honorable Robert White

June 11, 2025

Approved:

John C. Smith
Plaintiff

Thomas D. Siver
Defendant

UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN

YACOV APELBAUM, a New Youk resident,
and XRVISION, LTD., a New Your corporation,

Plaintiffs,

HON. ROBERT WHITE
Case No. 23-CV-11718

vs.

BILL BACHENBERG ET AL.,

Defendants.

/

Johon C. Burns

Burns Law Firm
PO Box 191250
Saint Louis, MO 63119
314-329-5040
Fax: 314-282-8136
Email:

Todd A. Stuart

Stuart Law, PLC

429 Turner Ave. NW
Grand Rapids, MI 49504
Office: 616-284-1658
Email: tstuart@stuartlawplc.com

Thomas D. Siver

Siver & Associates, PLLC
PO Box 3253
Grand Rapids, MI 49501
(616)261-5800
Email: tsiver@siverlaw.com

Michael J. Smith

Michael J Smith Assoc
12900 Hall Road
Suite 300
Sterling Heights, MI 48313
(586) 254-0200

Fax: (586) 254-0201
Email: msmith@mikesmithlaw.com

ORDER OF DISMISSAL WITH PREJUDICE

This Court finds Defendant Bill Bachenberg has satisfied the \$500,00.00 demand, and this case is now closed and dismissed with prejudice.

Honorable Robert White

June 11, 2025

Acknowledged:

Plaintiff's Counsel

Defendant's Counsel

Siver & Associates, PLLC: Re: Siver & Associates, PLLC: Re: Bachenberg Dimissal

4 messages

Thomas D. Siver <tsiver@siverlaw.com>

Fri, Jun 13, 2025 at 2:27 PM

To: Todd Stuart <tstuart@stuartlawplc.com>

Cc: Jonathon Burns [REDACTED] Michael Smith <msmith@mikesmithlaw.com>

Good day!

Finally this order is the last order and closes the case. No part of this case is left open as bill is the last active defendant.

The language should be:

This order resolves the last pending claim and closes the case.

You agreed to my language in my order I had sent to you and I sent the funds. You requested the ability to change only the attorney names and addresses in the caption. It is my understanding you have defaulted the other parties therefore the case is over with bill resolving your claims against him.

Please make the changes and resubmit to me for approval. Or in the alternative sign my order.

Tom Siver
Sent from my iPhone

On Jun 13, 2025, at 2:13 PM, Todd Stuart <tstuart@stuartlawplc.com> wrote:

Updated draft

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Founder and Managing Member

Stuart Law, PLC

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Founder and Managing Member

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<2025-06-13 - Apelbaum v Lambert - Stipulated Dismissal of Bachenburg.docx>

Thomas D. Siver <tsiver@siverlaw.com>

Fri, Jun 13, 2025 at 2:36 PM

To: Todd Stuart <tstuart@stuartlawplc.com>

Cc: Jonathon Burns [REDACTED], Michael Smith <msmith@mikesmithlaw.com>

Trying to reach out to you guys - someone please call me at 6162615800
Sent from my iPhone

On Jun 13, 2025, at 2:14 PM, Todd Stuart <tstuart@stuartlawplc.com> wrote:

Sorry, corrected Mr. Bachenberg's name spelling. Thanks!

Todd

[Quoted text hidden]

Thomas D. Siver <tsiver@siverlaw.com>

Fri, Jun 13, 2025 at 4:29 PM

To: Todd Stuart <tstuart@stuartlawplc.com>

Cc: Jonathon Burns [REDACTED] Michael Smith <msmith@mikesmithlaw.com>

Good day!

Struggling to have a conversation with my client.

Is there a time we can have a call Monday.

Very truly tryouts,

Tom Siver

[Quoted text hidden]

Todd Stuart <tstuart@stuartlawplc.com>

Fri, Jun 13, 2025 at 4:52 PM

To: "Thomas D. Siver" <tsiver@siverlaw.com>

Cc: Jonathon Burns [REDACTED] Michael Smith <msmith@mikesmithlaw.com>

I will make time. Let me know what works for everyone else. Have a great weekend everyone!

[Quoted text hidden]

Siver & Associates, PLLC: Re: Siver & Associates, PLLC: Re: Siver & Associates, PLLC: Re: Bachenberg Dismissal

4 messages

Thomas D. Siver <tsiver@siverlaw.com>

Mon, Jun 16, 2025 at 4:07 PM

To: Todd Stuart <tstuart@stuartlawplc.com>

Cc: Jonathon Burns [REDACTED] Michael Smith <msmith@mikesmithlaw.com>

Bill is traveling and I am hoping to be able to get some time with him tomorrow....thoughts on a time?
Sent from my iPhone

On Jun 13, 2025, at 4:53 PM, Todd Stuart <tstuart@stuartlawplc.com> wrote:

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Sorry, corrected Mr. Bachenberg's name spelling. Thanks!

Todd

On Fri, Jun 13, 2025 at 2:12 PM Todd Stuart <tstuart@stuartlawplc.com> wrote:

Updated draft

On Fri, Jun 13, 2025 at 1:55 PM Thomas D. Siver <tsiver@siverlaw.com> wrote:

Good day!

First the 500k needs to reference it is being paid pursuant to the demand. My initial proposed order was sufficient and John agreed to it with only attorney names and addresses being changed.

Second this order is only for bill and he doesn't speak for attorney lambert and doesn't need to make reference to her case.

Therefore please immediately make the changes and forward for approval. Finally, judge requires this order in word not pdf.

Tom Siver
616-261-5800

Sent from my iPhone

On Jun 13, 2025, at 1:47 PM, Todd Stuart <tstuart@stuartlawplc.com> wrote:

Tom, Mike and Jonathon,
Here is what we have for the cleaned up draft. Can I confirm everyone is
in agreement and we will get this filed ASAP? Thanks!

Todd

--



Todd A Stuart

Founder and Managing Member

Stuart Law, PLC

Appointments: [2851 Charlevoix](#)

[Dr SE #207, Grand Rapids, MI 49546](#)

Mailings: [5557 28th Street SE, STE B 328, Grand Rapids, MI 49512](#)

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--
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Founder and Managing Member

Stuart Law, PLC



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big firm knowledge

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big firm knowledge

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Jonathon Burns [REDACTED]

Mon, Jun 16, 2025 at 4:33 PM

To: "Thomas D. Siver" <tsiver@siverlaw.com>, Jonathon Burns [REDACTED]
Cc: Todd Stuart <tstuart@stuartlawplc.com>, Michael Smith <msmith@mikesmithlaw.com>

Hi Tom:

I am good to chat sometime in the later afternoon tomorrow. Not sure what Todd's schedule is like.

Thanks,
John

[Quoted text hidden]

--
Very truly yours,

/s/
John C. Burns
Attorney
P: 314-329-5040
PO Box 191250
St. Louis, MO 63119

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Todd Stuart <tstuart@stuartlawplc.com>
To: "Thomas D. Siver" <tsiver@siverlaw.com>
Cc: Jonathon Burns [REDACTED]

Mon, Jun 16, 2025 at 4:51 PM

Michael Smith <msmith@mikesmithlaw.com>

Hey Tom,
I have a hearing up north that will be all consuming tomorrow. Jon has a court of appeals hearing, so I am not sure on his availability. Thanks!

Todd
[Quoted text hidden]

Jonathon Burns [REDACTED]
To: Todd Stuart <tstuart@stuartlawplc.com>, Jonathon Burns [REDACTED]
Cc: "Thomas D. Siver" <tsiver@siverlaw.com>, Michael Smith <msmith@mikesmithlaw.com>

Tue, Jun 17, 2025 at 1:10 PM

Hi Tom:
Just checking in - we doing a call this afternoon?

Thanks,
John
[Quoted text hidden]
[Quoted text hidden]

Siver & Associates, PLLC: Re: Siver & Associates, PLLC: Re: Siver & Associates, PLLC: Re: Siver & Associates, PLLC: Re: Bachenberg Dismissal

1 message

Thomas D. Siver <tsiver@siverlaw.com>

Tue, Jun 17, 2025 at 4:51 PM

To: Jonathon Burns [REDACTED]

Cc: Todd Stuart <tstuart@stuartlawplc.com>, Michael Smith <msmith@mikesmithlaw.com>, Jonathon Burns [REDACTED]
[REDACTED]

Still attempting to get time with Bill - hopefully I can connect with him soon (tonight). I will be in touch hopefully tomorrow.

Tom Siver
616-261-5800
Sent from my iPhone

On Jun 17, 2025, at 1:11 PM, Jonathon Burns [REDACTED] wrote:

Hi Tom:

Just checking in - we doing a call this afternoon?

Thanks,
John

On Mon, Jun 16, 2025 at 4:51 PM Todd Stuart <tstuart@stuartlawplc.com> wrote:

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Sent from my iPhone

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Updated draft

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Sent from my iPhone

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Todd

--



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Stuart Law, PLC

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--
Very truly yours,

/s/
John C. Burns
Attorney
P: 314-329-5040
PO Box 191250
St. Louis, MO 63119

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